

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

FILED - GR
November 14, 2007 12:10 PM
RONALD C. WESTON, SR., CLERK
U.S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: EC/

UNITED STATES OF AMERICA,

Plaintiff,
vs.

No. **1:07-cr-260**
Hon. **Robert Holmes Bell**
Chief U.S. District Judge

RODNEY LEE CHUPP,
JESUS CORDERO-GALLEGOS
MARCO ANTONIO GUTIERREZ,
DANIEL JOHN LEWIS, and
LARRY OWENS,

INDICTMENT

Defendants.

The Grand Jury charges:

(CONSPIRACY TO DISTRIBUTE MARIJUANA)

Beginning at least as early as January 1, 1999 and continuing through November 13, 2007, in Newaygo County, in the Southern Division of the Western District of Michigan, and elsewhere,

RODNEY LEE CHUPP,
JESUS CORDERO-GALLEGOS
MARCO ANTONIO GUTIERREZ,
DANIEL JOHN LEWIS, and
LARRY OWENS

did knowingly, intentionally and unlawfully combine, conspire, confederate and agree together and with other persons, both known and unknown to the Grand Jury, to distribute and possess with intent to distribute more than one thousand (1,000) kilograms of a mixture or substance containing marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a).

PURPOSE AND OBJECTS OF THE CONSPIRACY

From as early as 1999 and continuing until the date of return of this Indictment, within the Western District of Michigan, and elsewhere, there existed a criminal enterprise that consisted of individuals who caused marijuana to be imported into the United States from the Republic of Mexico, transported from Texas to Michigan and then, for substantial sums of cash, caused the drugs to be sold in Newaygo, Muskegon and Kent Counties, among other places.

As part of the conspiracy, RODNEY LEE CHUPP arranged to purchase hundreds of pounds of marijuana from JESUS CORDERO-GALLEGOS and MARCO ANTONIO GUTIERREZ, among others. The marijuana would be shipped from Texas to Michigan by various means, including private commercial courier services and in vehicles driven by co-conspirators. Once in Michigan, the drugs would be stored at several locations until distributed by RODNEY LEE CHUPP, JESUS CORDERO-GALLEGOS and MARCO ANTONIO GUTIERREZ, among others.

It was further a part of the conspiracy that RODNEY LEE CHUPP arranged for vehicles to be modified with hidden compartments in which large quantities of cash and marijuana could be hidden.

As part of the conspiracy, RODNEY LEE CHUPP recruited couriers to transport the marijuana from Texas to Michigan. When some of these couriers were later arrested, RODNEY LEE CHUPP hired and paid for their legal counsel and then paid fines, costs and associated probation fees for them.

It was further part of the conspiracy that DANIEL JOHN LEWIS would store large quantities of marijuana and currency for RODNEY LEE CHUPP and would assist

RODNEY LEE CHUPP in the distribution of the marijuana.

It was further part of the conspiracy that RODNEY LEE CHUPP, JESUS CORDERO-GALLEGOS and MARCO ANTONIO GUTIERREZ had customers who would purchase multiple pounds of marijuana and distribute it in the Western District of Michigan. These customers included DANIEL JOHN LEWIS and LARRY OWENS, among others.

It was further part of the conspiracy that the co-conspirators used violence and threats of violence in order to intimidate members of the conspiracy unless they engaged in conduct acceptable to the enterprise. In furtherance of the conspiracy, several of the co-conspirators would possess firearms to protect their marijuana and ill-gotten gains.

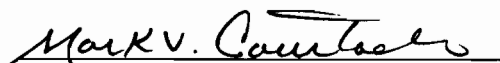
21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)(vii)

A TRUE BILL



GRAND JURY FOREPERSON

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